

## Exhibit 3

**In The Matter Of:**  
*Fair Housing Center of Metropolitan Detroit vs.*  
*Iron Street Properties, LLC, et al.*

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*Statement on the Record*  
*January 26, 2017*

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*Original File STATEMENT ON THE RECORD.txt*  
*Min-U-Script® with Word Index*

Page 1

1           IN THE DISTRICT COURT OF THE UNITED STATES  
2           FOR THE EASTERN DISTRICT OF MICHIGAN  
3           SOUTHERN DIVISION

4  
5    **FAIR HOUSING CENTER OF**  
6    **METROPOLITAN DETROIT,**  
7           **Plaintiff,**  
8            vs.           Case No. 5:16-cv-12140-JCO-MKM  
9    **IRON STREET PROPERTIES, LLC,**  
10   **d/b/a RIVER PARK LOFTS,**  
11   **BOYDELL DEVELOPMENT, INC.**  
12   **and DENNIS KEFALLINOS,**  
13           **Defendants.**

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16       **The Statement on the Record**  
17       **in the above-captioned case,**  
18       **Taken at 645 Griswold Avenue, Suite 1360,**  
19       **Detroit, Michigan,**  
20       **Commencing at 9:15 a.m.,**  
21       **Thursday, January 26, 2017,**  
22       **Before Kathryn L. Janes, CSR-3442, RMR, RPR.**

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Page 1

1    oit, Michigan  
2    sday, January 26, 2017  
3    a.m.

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5    **MR. THOMAS:** Today is January 26, 2017. It  
6    is currently 9:15 in the morning. I'm Attorney  
7    Stephen Thomas. I'm counsel for plaintiff in the  
8    matter of the Fair Housing Center of Metropolitan  
9    Detroit, plaintiff, versus Iron Street Properties, et  
10   al., defendants. Case Number 16-12140 in the U.S.  
11   District Court for the Eastern District of Michigan,  
12   Southern Division, Detroit.

13   The day is the date and time scheduled for  
14   two depositions, one scheduled for 9:00 a.m. and the  
15   other is scheduled for 2:00 p.m. The first one is the  
16   deponent is a Dennis Kefallinos. I'll spell it,  
17   K-E-F-A-L-L-I-N-O-S, and the second is Liz Telegadas,  
18   I'll spell it, T-E-L-E-G-A-D-A-S.

19   Yesterday evening I got a phone call from  
20   Ben Gonek. Mr. Gonek represents all the defendants in  
21   this matter, and he indicated that the two deponents  
22   would not appear today. He indicated that he would be  
23   filing a protective -- a motion for protective order  
24   to cancel or excuse their depositions today.

25   I checked the court docket, there has been

Page 3

1   **APPEARANCES:**  
2  
3   **STEPHEN A. THOMAS**  
4   **Stephen A. Thomas, PLC**  
5   **645 Griswold Street**  
6   **Suite 1360**  
7   **Detroit, Michigan 48226**  
8   **313.965.2265**  
9   **sthomas@313965bank.com**

10      **Appearing on behalf of the Plaintiff.**

11  
12   **ALSO PRESENT:**  
13   **Michael Olshan, J.D.**

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Page 2

1    no motion filed in this matter. He indicated that he  
2    wanted to combine the Hardy case, that's Hardy versus  
3    the same defendants, Iron Street Properties, et al.,  
4    and that's Case Number 16-10693. There's no  
5    protective order excusing the appearance of the two  
6    deponents today, and there's no reason why Mr. Gonek  
7    and his client and the other employee should not be  
8    here today.

9    I would like to close the record.

10   One more thing I want to put on the record,  
11   we will be filing a motion to compel their attendance,  
12   thank you.

13   (Statement concluded at 9:17 a.m.)

Page 4

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Page 5

1 CERTIFICATE OF REPORTER

2  
3 E OF MICHIGAN )  
4 ) SS  
5 TY OF WAYNE )

7 I hereby certify that I reported  
8 stenographically the foregoing proceedings and  
9 testimony under oath at the time and place  
10 hereinbefore set forth; that thereafter the same was  
11 reduced to computer transcription under my  
12 supervision; and that this is a full, true, complete  
13 and correct transcription of said proceedings.

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Kathryn L. Jones

Kathryn L. Janes, CSR-3442, RPR.

## Notary Public

## Wayne County, Michigan

25 My commission expires: October 22, 2022

A	3:14,24 <b>Detroit</b> (2) 3:9,12 <b>District</b> (2) 3:11,11 <b>Division</b> (1) 3:12 <b>docket</b> (1) 3:25	3:16 <b>K-E-F-A-L-L-I-N-O-S</b> (1) 3:17	S	9:00 (1) 3:14 <b>9:15</b> (1) 3:6 <b>9:17</b> (1) 4:13
al (2) 3:10;4:3 appear (1) 3:22 appearance (1) 4:5 attendance (1) 4:11 Attorney (1) 3:6		L	same (1) 4:3 scheduled (3) 3:13,14,15 sday (1) 3:2 second (1) 3:17 <b>Southern</b> (1) 3:12 spell (2) 3:16,18 <b>Statement</b> (1) 4:13 <b>Stephen</b> (1) 3:7 <b>Street</b> (2) 3:9;4:3	
B	<b>Eastern</b> (1) 3:11 <b>employee</b> (1) 4:7 <b>et</b> (2) 3:9;4:3 <b>evening</b> (1) 3:19 <b>excuse</b> (1) 3:24 <b>excusing</b> (1) 4:5	<b>M</b> matter (3) 3:8,21;4:1 <b>Metropolitan</b> (1) 3:8 <b>Michigan</b> (2) 3:1,11 <b>more</b> (1) 4:10 <b>morning</b> (1) 3:6 <b>motion</b> (3) 3:23;4:1,11		T
C		N	<b>Telegadas</b> (1) 3:17 <b>T-E-L-E-G-A-D-A-S</b> (1) 3:18 <b>THOMAS</b> (2) 3:5,7 <b>Today</b> (5) 3:5,22,24;4:6,8 <b>two</b> (3) 3:14,21;4:5	
call (1) 3:19 <b>cancel</b> (1) 3:24 <b>Case</b> (3) 3:10;4:2,4 <b>Center</b> (1) 3:8 <b>checked</b> (1) 3:25 <b>client</b> (1) 4:7 <b>close</b> (1) 4:9 <b>combine</b> (1) 4:2 <b>compel</b> (1) 4:11 <b>concluded</b> (1) 4:13 <b>counsel</b> (1) 3:7 <b>Court</b> (2) 3:11,25 <b>currently</b> (1) 3:6	<b>F</b> <b>Fair</b> (1) 3:8 <b>filed</b> (1) 4:1 <b>filings</b> (2) 3:23;4:11 <b>first</b> (1) 3:15	O	<b>V</b>	
D		G		<b>versus</b> (2) 3:9;4:2
date (1) 3:13 <b>day</b> (1) 3:13 <b>defendants</b> (3) 3:10,20;4:3 <b>Dennis</b> (1) 3:16 <b>deponent</b> (1) 3:16 <b>deponents</b> (2) 3:21;4:6 <b>depositions</b> (2)	<b>Gonek</b> (3) 3:20,20;4:6	P	<b>Y</b>	
		H	<b>Yesterday</b> (1) 3:19	
		<b>Hardy</b> (2) 4:2,2 <b>Housing</b> (1) 3:8	1	
		I	<b>16-10693</b> (1) 4:4 <b>16-12140</b> (1) 3:10	
	<b>indicated</b> (3) 3:21,22;4:1 <b>Iron</b> (2) 3:9;4:3	R	2	
	J	<b>reason</b> (1) 4:6 <b>record</b> (2) 4:9,10 <b>represents</b> (1) 3:20	2:00 (1) 3:15 <b>2017</b> (2) 3:2,5 <b>26</b> (2) 3:2,5	
	January (2) 3:2,5		9	
	K			
	Kefallinos (1)			



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Job #: 170126KLJ  
Job Date: 01/26/2017  
Order Date: 01/26/2017  
DB Ref.#:  
Date of Loss: / /  
Your File #:  
Your Client:

# Invoice

Bill To:  
**Mr. Stephen A. Thomas**  
**Stephen A. Thomas PLC**  
**645 Griswold St.**  
**Suite 1360**  
**Detroit, MI 48226-4105**

Action: **Fair Housing Center**  
                  vs  
**Iron Street Properties**

Action #:

Rep: **KLJ**

Cert:

Item	Proceeding/Witness	Description	Units	Quantity		Amount
1	Statement on the Record	Time and Transcript / E-mail only	Item	1.00		\$105.00
Comments:  Offices in: Bingham Farms/Southfield   Grand Rapids   Ann Arbor   Detroit   Flint   Jackson   Lansing   Mt. Clemens   Saginaw   Troy						
					Sub Total	\$105.00
					Shipping	\$0.00
					Tax	N/A
					Total Invoice	\$105.00
					Payment	\$0.00
					Balance Due	\$105.00
Federal Tax I.D.: 76-0523238		Terms: Net 30. After 30 1.5%/Mo or Max Legal Rate				

### Comments:

Offices in: Bingham Farms/Southfield | Grand Rapids | Ann Arbor | Detroit | Flint | Jackson | Lansing | Mt. Clemens | Saginaw | Troy

Sub Total	\$105.00
Shipping	\$0.00
Tax	N/A
<b>Total Invoice</b>	<b>\$105.00</b>
Payment	\$0.00
<b>Balance Due</b>	<b>\$105.00</b>

Federal Tax I.D.: 76-0523238

Terms: Net 30. After 30 1.5%/Mo or Max Legal Rate

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Bill To:  
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Detroit, MI 48226-4105

Deliver To:  
**Mr. Stephen A. Thomas**  
Stephen A. Thomas PLC  
645 Griswold St.  
Suite 1360  
Detroit, MI 48226-4105

Invoice #: 620248  
Inv.Date: 01/27/2017  
Balance: \$105.00  
Job #: 170126KLJ  
Job Date: 01/26/2017  
DB Ref.#:  
Date of Loss: / /  
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